

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LAURO SANCHEZ, LUIS SANTOS, et al.,

Plaintiffs,

-VS-

BELLCLAIRE, INC. and KYUNG LEE,

Defendants.

**07 CIV. 3429 (WHP)**

**DEFENDANTS' RULE 26(a)(1)  
DISCLOSURES**

ECF CASE

Defendants **BELLCLAIRE, INC.** and **KYUNG LEE**, by their attorney, **THE LAW OFFICE OF JONATHAN Y. SUE**, submit the following:

(1) Initial Disclosures.

(A) the name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information;

Kyung Lee  
156 8<sup>th</sup> Avenue  
New York, New York 10011  
(917) 543-1434

The above named individual has personal knowledge as to plaintiffs' employment activities and wages.

(B) a copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings;

Plaintiffs' payroll records to be forwarded when compiled

(C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and

Defendants' costs and reasonable attorneys' fees.

(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgement which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgement.

None.

Dated: New York, New York  
August 8, 2007

LAW OFFICE OF JONATHAN Y. SUE

/s/ Jonathan Sue

By: Jonathan Y. Sue (JS / 0738)  
*Attorney for Defendants*  
1220 Broadway, Suite 502  
New York, New York 10001  
(212) 967-1001  
(212) 967-1112 facsimile

**To:** Law Office of Justin A. Zeller, P.C.  
Attn: Justin A. Zeller, Esq.  
222 Broadway, 19<sup>th</sup> Floor  
New York, New York 10038  
T: (212) 860-9169  
F: (212) 421-9387

LAW OFFICE OF  
JONATHAN Y. SUE

1220 Broadway  
Suite 502  
New York, NY 10001  
(212) 967-1001

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*Attorney for Defendants*

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